

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2738

MOTION DATE: March 6, 2017

**[PROPOSED] ORDER GRANTING
DEFENDANT PERSONAL CARE
PRODUCTS COUNCIL'S MOTION TO
DISMISS**

This matter having come before the Court by motion of counsel for Defendant Personal Care Products Council ("PCPC") for the dismissal of Plaintiffs' Complaints;

It is on this _____ day of _____, 2017,

1. **ORDERED** that PCPC's motion to dismiss is granted; and it is further
2. **ORDERED** that PCPC is dismissed with prejudice for lack of personal jurisdiction in those cases identified in PCPC's Exhibit A, Column 1; and it is further
3. **ORDERED** that PCPC is dismissed with prejudice pursuant to the applicable anti-SLAPP Acts in those cases identified in PCPC's Exhibit A, Column 2; and it is further
4. **ORDERED** that the alleged activities by PCPC are protected by the *Noerr-Pennington* doctrine, and consequently PCPC is dismissed from the MDL with prejudice; and it is further
5. **ORDERED** all claims against PCPC are dismissed with prejudice; and it is further
6. **ORDERED** that the clerk shall terminate PCPC as a party in the MDL; and it is further

7. **ORDERED** that a copy of this Order shall be served on the parties of record.

SO ORDERED

Honorable Freda L. Wolfson, U.S.D.J.